

**CL-19-6022-H**  
**NO. \_\_\_\_\_**

**GREGORIA JACKSON**  
**Plaintiff,**

**V.**

**JOSE ADOLFO SALINAS AND**  
**ANGELA SALINAS**  
**Defendants.**

§ **IN THE COUNTY COURT AT LAW**  
§  
§  
§ **NO. \_\_\_\_\_**  
§  
§  
§ **HIDALGO COUNTY, TEXAS**

**PLAINTIFF'S ORIGINAL PETITION**

**TO THE HONORABLE JUDGE OF SAID COURT:**

**NOW COMES** Gregoria Jackson, hereinafter called Plaintiff, complaining of and about Jose Adolfo Salinas and Angela Salinas, hereinafter called Defendants, and for cause of action shows unto the Court the following:

**DISCOVERY CONTROL PLAN LEVEL**

1. Plaintiff intends that discovery be conducted under Discovery Level 2.

**PARTIES AND SERVICE**

2. Plaintiff, Gregoria Jackson, is an Individual whose address is P.O. Box 1256, La Joya, Texas 78560.

3. Defendant Jose Adolfo Salinas, an Individual who is a resident of Texas, may be served with process at his home at the following address: 408 Denise Circle, La Joya, Texas or at 701 East Expressway 83, La Joya or wherever he may be found. Service of said Defendant as described above can be effected by personal delivery.

4. Defendant Angela Salinas, an Individual who is a resident of Texas, may be served with process at her home at the following address: 304 Yolanda St., La Joya, Texas or at 701 East Expressway 83, La Joya, Texas or wherever she may be found. Service of said

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Defendant as described above can be effected by personal delivery.

**JURISDICTION AND VENUE**

5. The subject matter in controversy is within the jurisdictional limits of this court.
6. Plaintiff seeks:
  - a. monetary relief over \$200,000 but not more than \$1,000,000.
8. This court has jurisdiction over the parties because Defendants are Texas residents.
9. Venue in Hidalgo County is proper in this cause.

**FACTS**

10. On or about November 12 and 13, 2019 Defendants engaged in defamatory, slanderous and libelous conduct against Plaintiff by making derogatory comments on Facebook which they knew were false.

**GREGORIA JACKSON'S CLAIM FOR DEFAMATION, SLANDER AND LIBEL**

11. The statements made by Defendants were false and the Defendants knew at the time of the posting that said statements were false. Said comments were posted intentionally and with the sole intent of defaming Plaintiff's character and causing consternation to her person; at the time of said posting, Defendants knew or should have known that said comments were not true.

**DAMAGES FOR PLAINTIFF, GREGORIA JACKSON**

12. As a direct and proximate result of the occurrence made the basis of this lawsuit, Plaintiff, Gregoria Jackson, was caused to suffer severe mental anguish, and to incur the following damages:
  - A. Physical pain and suffering in the past;

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- B. Physical pain and suffering in the future;
- C. Mental anguish in the past; and
- D. Mental anguish in the future.

**PRAYER**

**WHEREFORE, PREMISES CONSIDERED**, Plaintiff, Gregoria Jackson, respectfully prays that the Defendants be cited to appear and answer herein, and that upon a final hearing of the cause, judgment be entered for the Plaintiff against Defendants, jointly and severally, for damages in an amount within the jurisdictional limits of the Court; together with pre-judgment interest at the maximum rate allowed by law; post-judgment interest at the legal rate, costs of court; and such other and further relief to which the Plaintiff may be entitled at law or in equity.

Respectfully submitted,

By: /s/Roberto Jackson, Jr.  
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